

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH
CAROLINA CIVIL ACTION NO. 1:15-CV-559** **FILED IN THIS OFFICE**

THE CITY OF GREENSBORO, LEWIS A. :
BRANDON III, JOYCE JOHNSON, :
NELSON JOHNSON, RICHARD ALAN :
KORITZ, SANDRA SELF KORITZ, AND :
CHARLI MAE SYKES, Plaintiffs, :

2015 JUL 14 PM 1:55

CLERK US DISTRICT COURT
GREENSBORO, N.C.

HARTZMAN'S MOTION FOR LEAVE
TO FILE AMICUS BRIEF

v. :
: :
THE GUILFORD COUNTY BOARD OF :
ELECTIONS, Defendant. :

I, George Hartzman respectfully move, pursuant to the Court's inherent authority, to file a brief as amicus curiae regarding whether THE CITY OF GREENSBORO, LEWIS A. BRANDON III, JOYCE JOHNSON, NELSON JOHNSON, RICHARD ALAN KORITZ, SANDRA SELF KORITZ, AND CHARLI MAE SYKES has cause to file a suit against THE GUILFORD COUNTY BOARD OF ELECTIONS.

A copy of the proposed brief is attached as Exhibit A to this Motion.

1. DISTRICT COURTS HAVE AUTHORITY TO ACCEPT AMICUS BRIEFS

Federal district courts possess the inherent authority to accept amicus briefs. In re Bayshore Ford Truck Sales, Inc., 471 F.3d 1233, 1249 n.34 (11th Cir. 2006) ("[D]istrict courts possess the inherent authority to appoint 'friends of the court' to assist in their proceedings."); Jin v. Ministry of State Security, 557 F. Supp. 2d 131, 136 (D.D.C. 2008) ("district courts have inherent authority to appoint or deny amici which is derived from Rule 29 of the Federal Rules of Appellate Procedure"); United States v. Davis, 180 F. Supp. 2d 797, 800 (E.D. La. 2001) (noting that district courts have authority to permit the filing of amicus briefs). The role of amici is to assist the court "in cases of general public interest by making suggestions to the court, by providing supplementary assistance to existing counsel, and by insuring a complete and plenary presentation of difficult issues so that the court may reach a proper decision." Newark Branch, N.A.A. C.P. v. Town of Harrison, N.J., 940 F.2d 792, 808 (3d Cir. 1991). This authority supports the Court's exercise of its discretion to accept my amicus brief.

2. IF THE COURT ALLOWS THE FILING OF HARTZMAN'S AMICUS BRIEF, THE PLAINTIFFS SHOULD BE GIVEN AN OPPORTUNITY TO RESPOND

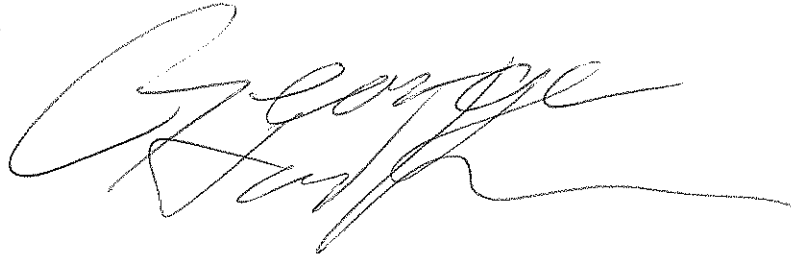
If the Court grants my Motion to participate as amicus and accepts its brief for filing, the parties should have an adequate opportunity to respond by a date set by the Court as the due date for the parties' responses to the amicus brief.

3. I am available for a hearing if necessary.

4. As I am acting Pro Se, an order is not attached as I believe the Court would find itself more legally capable to render an order than myself.

Respectfully submitted, and dated this Tuesday, July 14, 2015.

Signed Tuesday, July 14, 2015



George Hartzman, Pro Se
2506 Baytree Drive
Greensboro, North Carolina 27455
336-420-4916
hartzmancpe@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, July 14, 2015, I served the foregoing by U.S. Mail, properly addressed and postage prepaid with service tracking, upon the following;

Attorneys for Attorneys for the City of Greensboro, Plaintiff;

Jim W. Phillips Jim W. Phillips, Jr.
N.C. State Bar No. 12516
jphillips@brookspierce.com

Julia C. Ambrose
N.C. State Bar No. 37534
jambrose@brookspierce.com

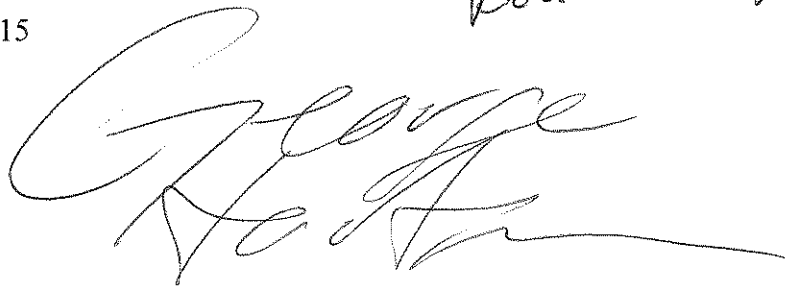
Daniel F. E. Smith
N.C. State Bar No.: 41601
dsmith@brookspierce.com
Brooks, Pierce, McLendon, Humphrey & Leonard, L.L.P.
Post Office Box 26000 Greensboro, NC 27420-6000 Phone: 336/373-8850 Fax: 336/378-1001

Attorneys for Plaintiffs Lewis A. Brandon III, Joyce Johnson, Nelson Johnson, Richard Alan Koritz, Sandra Self Koritz, and Charli Mae Sykes;

Anita S. Earls
N.C. State Bar No. 15597
anita@southerncoalition.org
Southern Coalition for Social Justice
1415 West Highway 54, Suite 101
Durham, NC 27707
Telephone: 919-323-3380, ext. 115
Facsimile: 919-323-3942

Allison J. Riggs
N.C. State Bar No. 40028
allison@southerncoalition.org

+ Guilford County
Board of Elections



George Hartzman, Pro Se
2506 Baytree Drive
Greensboro, North Carolina 27455
336-420-4916
hartzmancpe@gmail.com